

DEC 19 2013



AT&T Services, Inc.  
2600 Camino Ramon, Rm 3E450Z  
San Ramon, CA 94583

T: 925.327.2532  
F: 281.664.4201  
www.att.com

December 12, 2013

East Tennessee Permit Program & Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
Nashville, TN 37243

Knoxville Environmental Field Office  
Division of Air Pollution Control  
3711 Middlebrook Pike  
Knoxville, TN 37921

Re: Startup Certification for 967415P and Operating Permit Application  
4782 Highway 63, Speedwell, Tennessee (Emission Source 13-0114-01)

Dear Sir or Madam:

On behalf of New Cingular Wireless PCS, LLC dba AT&T Mobility (referred to herein as "AT&T"), we are submitting the enclosed application for operation of one (1) 50 kW Generac stationary diesel emergency generator located 4782 Highway 63, Speedwell, Tennessee. The permit application forms can be found in Attachment A.

AT&T received Permit to Construct 967415P issued by the Tennessee Department of Environment and Conservation (TDEC) authorizing the installation of the generator. Pursuant to Condition 22 of the permit, this letter serves as notification of a start-up date of December 4, 2013 and is being submitted within 30 days of startup. Additionally, a complete copy of the construction permit with the startup certification is included in Attachment B.

AT&T is submitting the attached TDEC Forms APC-100, APC-101, and APC-102 to obtain an operating permit for the emergency generator in accordance with Condition 21. AT&T appreciates TDEC's review of this application. If you have any questions, or need further information, please do not hesitate to contact me at (925) 327-2532.

Sincerely,

AT&T SERVICES, INC.

A handwritten signature in cursive script that reads "M. Blagich for".

Barbara Walden  
Manager, Environment, Health & Safety

Attachments

## **ATTACHMENT A**

---

### **APPLICATION FORMS**

State of Tennessee  
 Department of Environment and Conservation  
 Division of Air Pollution Control  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
 Nashville, TN 37243  
 Telephone: (615) 532-0554

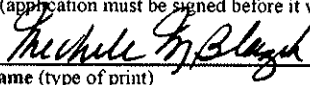


APC 100

## NON-TITLE V PERMIT APPLICATION FACILITY IDENTIFICATION

| Please type or print and submit in duplicate for each emission source. Attach appropriate source description forms.                                       |                       |                    |   |                       |
|---|-----------------------|--------------------|---|-----------------------|
| <b>SITE INFORMATION</b>   |                       |                    |   |                       |
| 1. <b>Organization's legal name</b><br>New Cingular Wireless PCS, LLC dba AT&T Mobility   |                       |                    | For<br>APC<br>use<br>only                     | APC Company point no. |
| 2. <b>Site name</b> (if different from legal name)  |                       |                    |   | APC Log/Permit no.    |
| 3. <b>Site address</b> (St./Rd./Hwy.)<br>4782 Highway 63  |                       |                    | County name<br>Claiborne                      |                       |
| City or distance to nearest town<br>Speedwell   |                       | Zip code<br>37870  | 4. <b>NAICS or SIC code</b><br>517210         |                       |
| 5. <b>Site location</b><br>(in lat. /long.)   | Latitude<br>36°27'38" |                    | Longitude<br>-83°53'53"                       |                       |
| <b>CONTACT INFORMATION (RESPONSIBLE PERSON)</b>   |                       |                    |   |                       |
| 6. <b>Responsible person/Authorized contact</b><br>Michele M. Blazek, Assistant Secretary   |                       |                    | Phone number with area code<br>(925) 327-2532 |                       |
| <b>Mailing address</b> (St./Rd./Hwy.)<br>2600 Camino Ramon, Room 3E450Z   |                       |                    | Fax number with area code<br>(281) 664-4201   |                       |
| City<br>San Ramon   | State<br>CA           | Zip code<br>94583  | Email address<br>bw2989@att.com               |                       |
| <b>CONTACT INFORMATION (TECHNICAL)</b>  |                       |                    |   |                       |
| 7. <b>Principal technical contact</b><br>Barbara Walden, EH&S Manager   |                       |                    | Phone number with area code<br>(925) 327-2532 |                       |
| <b>Mailing address</b> (St./Rd./Hwy.)<br>2600 Camino Ramon, Room 3E450Z   |                       |                    | Fax number with area code<br>(281) 664-4201   |                       |
| City<br>San Ramon   | State<br>CA           | Zip code<br>94583  | Email address<br>bw2989@att.com               |                       |
| <b>CONTACT INFORMATION (BILLING)</b>  |                       |                    |   |                       |
| 8. <b>Billing contact</b><br>Barbara Walden, EH&S Manager   |                       |                    | Phone number with area code<br>(925) 327-2532 |                       |
| <b>Mailing address</b> (St./Rd./Hwy.)<br>2600 Camino Ramon, Room 3E450Z   |                       |                    | Fax number with area code<br>(281) 664-4201   |                       |
| City<br>San Ramon   | State<br>CA           | Zip code<br>94583  | Email address<br>bw2989@att.com               |                       |
| <b>EMISSION SOURCE INFORMATION</b>  |                       |                    |   |                       |
| 9. <b>Emission source no.</b> (number which uniquely identifies this source)<br>GEN 1   |                       |                    |   |                       |
| 10. <b>Brief description of emission source</b><br>50 kW diesel-fired emergency generator (design rating) equipped with an engine rated at 70 kW (93 hp). |                       |                    |   |                       |
| 11. <b>Normal operation:</b><br>500 hours/year  | Hours/Day<br>N/A      | Days/Week<br>N/A   | Weeks/Year<br>N/A                             | Days/Year<br>N/A      |
| 12. <b>Percent annual throughput</b>  | Dec. – Feb.<br>N/A    | March – May<br>N/A | June – August<br>N/A                          | Sept. – Nov.<br>N/A   |

(Over)

| TYPE OF PERMIT REQUESTED  |  |   |   |  |
|---|--|---|---|--|
| 13. Operating permit<br>( X )   | Date construction started<br>November 12, 2013 | Date completed<br>December 4, 2013      | Last permit no.<br>967415P                  | Emission source reference number<br>13-0114-01 |
| Construction permit<br>( )  | Last permit no.                                |   | Emission source reference number            |  |
| If you choose Construction permit, then choose either New Construction, Modification, or Location transfer  |  |   |   |  |
|   | New Construction<br>( )                        | Starting date                           | Completion date                             |  |
|   | Modification<br>( )                            | Date modification started or will start | Date completed or will complete             |  |
|   | Location transfer<br>( )                       | Transfer date                           | Address of last location                    |  |
| 14. Describe changes that have been made to this equipment or operation since the last construction or operating permit application:  |  |   |   |  |
| N/A   |  |   |   |  |
| SIGNATURE   |  |   |   |  |
| Based upon information and belief formed after a reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in this application and any attached application(s) is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury. |  |   |   |  |
| 15. Signature (application must be signed before it will be processed)  |  |   | Date  |  |
|    |  |   | 12/12/2013                                  |  |
| Signer's name (type of print)<br>Michele M. Blazek  |  | Title<br>Assistant Secretary            | Phone number with area code<br>925-327-2532 |  |

**Table of Pollution Reduction Device or Method Codes**

Note: For cyclones, settling chambers, wet scrubbers, and electrostatic precipitators; the efficiency ranges correspond to the following percentages:

High: 95-99+%      Medium: 80-95%      And Low: Less than 80%.

If the system has several pieces of connected control equipment, indicate the sequence. For example: 008'010.97%

If none of the below codes fit, use 999 as a code for other and specify in the comments.

|   |     |   |     |
|---|-----|---|-----|
| No Equipment.....   | 000 | Limestone Injection - Dry.....  | 041 |
| Activated Carbon Adsorption.....                                | 048 | Limestone Injection - Wet.....  | 042 |
| Afterburner - Direct Flame.....                                 | 021 | Liquid Filtration System.....   | 049 |
| Afterburner - Direct Flame with Heat Exchanger.....             | 022 | Mist Eliminator - High Velocity.....  | 014 |
| Afterburner - Catalytic.....                                    | 019 | Mist Eliminator - Low Velocity.....   | 015 |
| Afterburner - Catalytic with Heat Exchanger.....                | 020 | Process Change.....   | 046 |
| Alkalized Alumina.....  | 040 | Process Enclosed.....   | 054 |
| Catalytic Oxidation - Flue Gas Desulfurization.....             | 039 | Process Gas Recovery.....   | 060 |
| Cyclone - High Efficiency.....                                  | 007 | Settling Chamber - High Efficiency.....   | 004 |
| Cyclone - Medium Efficiency.....                                | 008 | Settling Chamber - Medium Efficiency.....                                       | 005 |
| Cyclone - Low Efficiency.....                                   | 009 | Settling Chamber - Low Efficiency.....  | 006 |
| Dust Suppression by Chemical Stabilizers or Wetting Agents..... | 062 | Spray Tower (Gaseous Control Only).....   | 052 |
| Electrostatic Precipitator - High Efficiency.....               | 010 | Sulfuric Acid Plant - Contact Process.....                                      | 043 |
| Electrostatic Precipitator - Medium Efficiency.....             | 011 | Sulfuric Acid Plant - Double Contact Process.....                               | 044 |
| Electrostatic Precipitator - Low Efficiency.....                | 012 | Sulfur Plant.....   | 045 |
| Fabric Filter - High Temperature.....                           | 016 | Vapor Recovery System (Including Condensers, Hooding and Other Enclosures)..... | 047 |
| Fabric Filter - Medium Temperature.....                         | 017 | Venturi Scrubber (Gaseous Control Only).....                                    | 053 |
| Fabric Filter - Low Temperature.....                            | 018 | Wet Scrubber - High Efficiency.....   | 001 |
| Fabric Filter - Metal Screens (Cotton Gins).....                | 059 | Wet Scrubber - Medium Efficiency.....   | 002 |
| Flaring.....  | 023 | Wet Scrubber - Low Efficiency.....  | 003 |
| Gas Adsorption Column - Packed.....                             | 050 | Wet Suppression by Water Sprays.....  | 061 |
| Gas Adsorption Column - Tray Type.....                          | 051 |   |     |
| Gas Scrubber (General: Not Classified).....                     | 013 |   |     |

**Table of Emission Estimation Method Codes**

|   |   |
|---|---|
| Not application / Emissions are known to be zero.....   | 0 |
| Emissions based on source testing.....  | 1 |
| Emissions based on material balance using engineering expertise and knowledge of process.....                                   | 2 |
| Emissions calculated using emission factors from EPA publications No. AP-42 Compilation of Air Pollution Emissions Factors..... | 3 |
| Judgment.....   | 4 |
| Emissions calculated using a special emission factor different from that in AP-42.....  | 5 |
| Other (Specify in comments).....  | 6 |

State of Tennessee  
 Department of Environment and Conservation  
 Division of Air Pollution Control  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
 Nashville, TN 37243  
 Telephone: (615) 532-0554



APC 101

## NON-TITLE V PERMIT APPLICATION EMISSION POINT DESCRIPTION

|   |   |                                  |                                     |                                 |  |                       |                     |
|---|---|----------------------------------|-------------------------------------|---------------------------------|--|-----------------------|---------------------|
| Please type or print and submit in duplicate for each stack or emission source. Attach to the Non-Title V Facility Identification Form (APC 100).                       |   |                                  |                                     |                                 |  |                       |                     |
| <b>GENERAL IDENTIFICATION AND DESCRIPTION</b>   |   |                                  |                                     |                                 |  |                       |                     |
| 1. Organization name<br>New Cingular Wireless PCS, LLC dba AT&T Mobility  |   |                                  |                                     |                                 | For<br>APC<br>use<br>only                            | APC Company point no. |                     |
| 2. Emission source no. (As on Non-Title V Facility Identification Form)<br>GEN 1  |   |                                  | Flow diagram point number           |                                 |  | APC Log/Permit no.    |                     |
| 3. Brief emission point description (Attach a sketch if appropriate):<br><br>Emergency use diesel generator designed for 50 kW; maximum engine output of 70 kW (93 hp). |   |                                  |                                     |                                 | Distance to nearest property line (Ft.)              |                       |                     |
| <b>STACK AND EMISSION DATA</b>  |   |                                  |                                     |                                 |  |                       |                     |
| 4. Stack or emission point data:<br><br>→   | Height above grade (Ft.)<br><br>7               | Diameter (Ft.)<br><br>0.25       | Temperature (°F)<br><br>930         | % of time over 125°F<br><br>100 | Direction of exit (Up, down or horizontal)<br><br>Up |                       |                     |
| Data at exit conditions:<br><br>→   | Flow (actual Ft. <sup>3</sup> /Min.)<br><br>534 | Velocity (Ft./Sec.)<br><br>181.3 | Moisture (Grains/Ft. <sup>3</sup> ) |                                 | Moisture (Percent)                                   |                       |                     |
| Data at standard conditions:<br><br>→   | Flow (Dry std. Ft. <sup>3</sup> /Min.)          | Velocity (Ft./Sec.)              | Moisture (Grains/Ft. <sup>3</sup> ) |                                 | Moisture (Percent)                                   |                       |                     |
| 5. Air contaminants   | Actual emissions                                |                                  |                                     |                                 | Emissions est. method code                           | Control devices *     | Control efficiency% |
|   | Emissions (Lbs./Hr.)                            |                                  | Concentration                       | Avg. emissions (Tons/Yr.)       |  |                       |                     |
|   | Average   | Maximum                          |                                     |                                 |  |                       |                     |
| Particulate matter  | 0.06  | 0.06                             | ** 8.82E-04 lb/kW-hr                | 0.02                            | 5 (Tier 3)   | None                  | N/A                 |
| Sulfur dioxide (SO <sub>2</sub> )   | 0.19  | 0.19                             | *** 2.05E-03 lb/hp-hr               | 0.05                            | 3  | None                  | N/A                 |
| Carbon monoxide (CO)  | 0.77  | 0.77                             | PPM 1.10E-02 lb/kW-hr               | 0.19                            | 5 (Tier 3)   | None                  | N/A                 |
| Organic compounds   | 0.02  | 0.02                             | PPM 2.65E-04 lb/kW-hr               | 4.63E-03                        | 5 (Vendor)   | None                  | N/A                 |
| Nitrogen oxides (NO <sub>x</sub> )  | 0.73  | 0.73                             | PPM 1.04E-02 lb/kW-hr               | 0.18                            | 5 (Tier 3)   | None                  | N/A                 |
| Fluorides   |   |                                  |                                     |                                 |  |                       |                     |
| Greenhouse gases (CO <sub>2</sub> equivalents)  | 126   | 126                              | 1.80 lb/kW-hr                       | 31.48                           | 5 (Vendor)   | None                  | N/A                 |
| Hazardous air pollutant (specify) Single- formaldehyde  | 7.68E-04  | 7.68E-04                         | 8.26E-06 lb/hp-hr                   | 1.92E-04                        | 3  | None                  | N/A                 |
| Hazardous air pollutant (specify) Total   | 2.47E-03  | 2.47E-03                         | 2.65E-05 lb/hp-hr                   | 6.17E-04                        | 3  | None                  | N/A                 |
| Other (specify)   |   |                                  |                                     |                                 |  |                       |                     |
| Other (specify)   |   |                                  |                                     |                                 |  |                       |                     |
| Other (specify)   |   |                                  |                                     |                                 |  |                       |                     |

(Over)

|   |   |
|---|---|
| <b>6. Check types of monitoring and recording instruments that are attached:</b><br>Opacity monitor (            ), SO <sub>2</sub> monitor (            ), NO <sub>x</sub> monitor (            ), Other (specify in comments) (            )  |   |
| <b>7. Comments</b><br>Emissions calculated based on the generator operating at full capacity for 500 hours per year, maximum engine rating, and Tier 3 emission factors for CO, NO <sub>x</sub> , and PM. Vendor factors used for VOC and GHG. AP-42 factor from Section 3.3 used for SO <sub>2</sub> . |   |
| <b>8. Control device or Method code description:</b>  | Description of operating parameters of device (flow rate, temperature, pressure drop, etc.):<br>N/A |

- \* Refer to the tables below for estimation method and control device codes.
- \*\* Exit gas particulate matter concentration units: Process – Grains/Dry Standard Ft<sup>3</sup> (70°F), Wood fired boilers - Grains/Dry Standard Ft<sup>3</sup> (70°F), all other boilers – Lbs. /Million BTU heat input.
- \*\*\* Exit gas sulfur dioxide concentrations units: Process – PPM by volume, dry bases, and boilers – Lbs. /Million BTU heat input

**Table of Pollution Reduction Device or Method Codes**  
(Alphabetical listing)

**Note:** For cyclones, settling chambers, wet scrubbers, and electrostatic precipitators; the efficiency ranges correspond to the following percentages:

High: 95-99+%, Medium: 80-95% And Low: Less than 80%.

If the system has several pieces of connected control equipment, indicate the sequence. For example: 008\*010.97%

If none of the below codes fit, use 999 as a code for other and specify in the comments.

|   |     |   |     |
|---|-----|---|-----|
| No Equipment.....   | 000 | Limestone Injection – Dry.....  | 041 |
| Activated Carbon Adsorption.....                                | 048 | Limestone Injection – Wet.....  | 042 |
| Afterburner – Direct Flame.....                                 | 021 | Liquid Filtration System.....   | 049 |
| Afterburner – Direct Flame with Heat Exchanger.....             | 022 | Mist Eliminator – High Velocity.....  | 014 |
| Afterburner – Catalytic.....                                    | 019 | Mist Eliminator – Low Velocity.....   | 015 |
| Afterburner – Catalytic with Heat Exchanger.....                | 020 | Process Change.....   | 046 |
| Alkalized Alumina.....  | 040 | Process Enclosed.....   | 054 |
| Catalytic Oxidation – Flue Gas Desulfurization.....             | 039 | Process Gas Recovery.....   | 060 |
| Cyclone – High Efficiency.....                                  | 007 | Settling Chamber – High Efficiency.....   | 004 |
| Cyclone – Medium Efficiency.....                                | 008 | Settling Chamber – Medium Efficiency.....                                       | 005 |
| Cyclone – Low Efficiency.....                                   | 009 | Settling Chamber – Low Efficiency.....  | 006 |
| Dust Suppression by Chemical Stabilizers or Wetting Agents..... | 062 | Spray Tower (Gaseous Control Only).....   | 052 |
| Electrostatic Precipitator – High Efficiency.....               | 010 | Sulfuric Acid Plant – Contact Process.....                                      | 043 |
| Electrostatic Precipitator – Medium Efficiency.....             | 011 | Sulfuric Acid Plant – Double Contact Process.....                               | 044 |
| Electrostatic Precipitator – Low Efficiency.....                | 012 | Sulfur Plant.....   | 045 |
| Fabric Filter – High Temperature.....                           | 016 | Vapor Recovery System (Including Condensers, Hooding and Other Enclosures)..... | 047 |
| Fabric Filter – Medium Temperature.....                         | 017 | Venturi Scrubber (Gaseous Control Only).....                                    | 053 |
| Fabric Filter – Low Temperature.....                            | 018 | Wet Scrubber – High Efficiency.....   | 001 |
| Fabric Filter – Metal Screens (Cotton Gins).....                | 059 | Wet Scrubber – Medium Efficiency.....   | 002 |
| Flaring.....  | 023 | Wet Scrubber – Low Efficiency.....  | 003 |
| Gas Adsorption Column -- Packed.....                            | 050 | Wet Suppression by Water Sprays.....  | 061 |
| Gas Adsorption Column – Tray Type.....                          | 051 |   |     |
| Gas Scrubber (General: Not Classified).....                     | 013 |   |     |

**Table of Emission Estimation Method Codes**

|   |   |
|---|---|
| Not application / Emissions are known to be zero.....   | 0 |
| Emissions based on source testing.....  | 1 |
| Emissions based on material balance using engineering expertise and knowledge of process.....                                   | 2 |
| Emissions calculated using emission factors from EPA publications No. AP-42 Compilation of Air Pollution Emissions Factors..... | 3 |
| Judgment.....   | 4 |
| Emissions calculated using a special emission factor different from that in AP-42.....  | 5 |
| Other (Specify in comments).....  | 6 |

State of Tennessee  
 Department of Environment and Conservation  
 Division of Air Pollution Control  
 William R. Snodgrass Tennessee Tower  
 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor  
 Nashville, TN 37243  
 Telephone: (615) 532-0554



APC 102

## NON-TITLE V PERMIT APPLICATION PROCESS OR FUEL BURNING SOURCE DESCRIPTION

|  |  |                               |                         |
|--|--|-------------------------------|-------------------------|
| Please type or print and submit in duplicate and attach to the Non-Title V Facility Identification Form (APC 100).   |  |                               |                         |
| <b>GENERAL IDENTIFICATION AND DESCRIPTION</b>  |  |                               |                         |
| 1. Organization name<br>New Cingular Wireless PCS, LLC dba AT&T Mobility   |  | For<br>APC<br>use<br>only     | APC Company - Point no. |
| 2. Emission source no. (As on Non-Title V Facility Identification Form)<br>GEN 1   |  |                               | APC Log/Permit no.      |
| 3. Description of process unit<br><br>Emergency use generator, GENERAC 5564-0 (SD-050). Engine manufactured after April 1, 2006. Rated at 50 kW; maximum engine output of 70 kW. Limited to 500 operating hours per year.  |  |                               |                         |
| <b>PROCESS SOURCE DESCRIPTION AND DATA</b>   |  |                               |                         |
| 4. Type of source  |  | (Check only one option below) |                         |
| Process Source: Apply for a separate Permit for each source. (Check at right and complete lines 5, 6, and 11)  |  | (   )                         |                         |
| Process Source with in process fuel: Products of combustion contact materials heated.<br>Apply for a separate permit for each source. (Check at right and complete lines 5, 6, and 8 through 11)   |  | (   )                         |                         |
| Non-Process fuel burning source: Products of combustion do not contact materials heated.<br>Complete this form for each boiler or fuel burner and complete a Non-Title V Emission Point Description Form (APC 101) for each stack. (Check at right and complete lines 7 to 11) |  | ( X )                         |                         |
| 5. Type of operation:<br>Continuous (   )                      Batch (   )   |  | Normal batch time             | Normal batches/day      |
| 6. Process material inputs and<br>In-process solid fuels   |  | Diagram reference             |                         |
|  |  | Input rates (pounds/hour)     |                         |
|  |  | Design                        | Actual                  |
| A.   |  |                               |                         |
| B.   |  |                               |                         |
| C.   |  |                               |                         |
| D.   |  |                               |                         |
| E.   |  |                               |                         |
| F.   |  |                               |                         |
| G.   |  |                               |                         |
| Totals   |  |                               |                         |

\* A simple process flow diagram must be attached.

(Over)

| BOILER, BURNER, GENERATOR, OR SIMILAR FUEL BURNING PROCESS DESCRIPTION  |                         |                            |   |  |   |                   |                             |
|---|-------------------------|----------------------------|---|--|---|-------------------|-----------------------------|
| 7. Boiler or burner data: (Complete lines 7 to 11 using a separate form for each boiler, burner, etc.)  |                         |                            |   |  |   |                   |                             |
| Number  | Stack number**          | Type of firing***          | Rated horsepower                                      | Rated input capacity (10 <sup>6</sup> BTU/Hr.) | Other rating (specify capacity and units) |                   |                             |
| GEN 1   | GEN 1                   | Internal Combustion Engine | 93 (engine)   | 0.57 (engine)                                  | 70 kW (engine); 50 kW (generator)         |                   |                             |
| Serial no.  | Date constructed        | Date manufactured          | Date of last modification (explain in comments below) |  |   |                   |                             |
| N/A   | November 12, 2013       | 2013                       |   |  |   |                   |                             |
| ** Source with a common stack will have the same stack number.<br>*** Cyclone, spreader (with or without reinjection), pulverized (wet or dry bottom, with or without reinjection), other stoker (specify type, hand fired, automatic, or other type (describe below in comments)). |                         |                            |   |  |   |                   |                             |
| FUEL USED IN BOILER, BURNER, GENERATOR, OR SIMILAR FUEL BURNING SOURCE  |                         |                            |   |  |   |                   |                             |
| 8. Fuel data: (Complete for a process source with in process fuel or a non-process fuel burning source)   |                         |                            |   |  |   |                   |                             |
| Primary fuel type (specify)   |                         |                            |   | Standby fuel type(s) (specify)                 |   |                   |                             |
| Ultra low sulfur diesel   |                         |                            |   |  |   |                   |                             |
| Fuels used  | Annual usage            | Hourly usage               |   | % Sulfur                                       | % Ash                                     | BTU value of fuel | (For APC use only) SCC code |
|   |                         | Design                     | Average   |  |   |                   |                             |
| Natural gas:  | 10 <sup>6</sup> Cu. Ft. | Cu. Ft.                    | Cu. Ft.   | / / / /  | / /                                       | 1,000             |                             |
|   |                         |                            |   | / / / /  | / /                                       |                   |                             |
| #2 Fuel oil:  | 10 <sup>3</sup> Gal.    | Gal.                       | Gal.  |  | / /                                       |                   |                             |
| Primary   | 2.08                    | 4.15                       | 4.15  | 0.0015   | / /                                       | 137,000 Btu/gal   |                             |
| #5 Fuel oil:  | 10 <sup>3</sup> Gal.    | Gal.                       | Gal.  |  | / /                                       |                   |                             |
|   |                         |                            |   |  | / /                                       |                   |                             |
| #6 Fuel oil:  | 10 <sup>3</sup> Gal.    | Gal.                       | Gal.  |  | / /                                       |                   |                             |
|   |                         |                            |   |  | / /                                       |                   |                             |
| Coal:   | Tons                    | Lbs.                       | Lbs.  |  |   |                   |                             |
| Wood:   | Tons                    | Lbs.                       | Lbs.  | / / / /  | / /                                       |                   |                             |
|   |                         |                            |   | / / / /  | / /                                       |                   |                             |
| Liquid propane:   | 10 <sup>3</sup> Gal.    | Gal.                       | Gal.  | / / / /  | / /                                       | 85,000            |                             |
|   |                         |                            |   | / / / /  | / /                                       |                   |                             |
| Other (specify type & units):   |                         |                            |   |  |   |                   |                             |
| 9. If Wood is used as a fuel, specify types and estimate percent by weight of bark  |                         |                            |   |  |   |                   |                             |
| N/A   |                         |                            |   |  |   |                   |                             |
| 10. If Wood is used with other fuels, specify percent by weight of wood charged to the burner.  |                         |                            |   |  |   |                   |                             |
| N/A   |                         |                            |   |  |   |                   |                             |
| 11. Comments  |                         |                            |   |  |   |                   |                             |
| Source is limited to 500 operating hours per year and will operate as an emergency engine.  |                         |                            |   |  |   |                   |                             |

**ATTACHMENT B**

---

**CONSTRUCTION PERMIT CERTIFIED FOR STARTUP**



Permit to Construct or Modify an Air Contaminant Source Issued Pursuant to Tennessee Air Quality Act

Date Issued: September 4, 2013

Permit Number:  
967415P

Date Expires: September 1, 2014

Issued To:

New Cingular Wireless PCS, LLC dba AT&T Mobility

Installation Address:

4782 Highway 63  
Speedwell

Installation Description:

Emergency Diesel Fired Generator, 50 KW, equipped with engine  
rated at 70 KW (93 HP)

Emission Source Reference No.

13-0114-01  
NSPS/NESHAP

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

**CONDITIONS:**

1. The application that was utilized in the preparation of this permit is dated June 5, 2013 and is signed by Michele M. Blazek, Assistant Secretary for the permitted facility. If this person terminates employment or is reassigned different duties and is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

(conditions continued on next page)

  
TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON-TRANSFERABLE

**POST AT INSTALLATION ADDRESS**

2. The horsepower rating for this source is 93 brake horsepower.  
TAPCR 1200-03-09-.01(1)(d) and the application dated June 5, 2013  
The Technical Secretary may require the permittee to prove compliance with this horsepower rating.
3. Only diesel fuel that meets the requirements in condition 15 shall be used as fuel for this source.  
TAPCR 1200-03-09-.01(1)(d) and the application dated June 5, 2013  
Compliance with this requirement shall be assured by maintaining records of fuel usage.
4. Particulate Matter (TSP) emitted from this source shall not exceed 0.6 pounds (lb) per million Btus (MM Btu)(0.34 pounds per hour).  
TAPCR 1200-03-06-.02(2)  
Compliance with this requirement shall be assured by operating the diesel generator as designed and complying with condition 3.
5. Sulfur dioxide (SO<sub>2</sub>) emitted from this source shall not exceed 0.001 pounds per hour based on a daily average.  
TAPCR 1200-03-14-.01(3)  
Compliance with this requirement shall be assured by operating the diesel generator as designed and complying with condition 3.
6. Volatile organic compounds (VOC) emitted from this source shall not exceed 0.02 pounds per hour based on a daily average.  
TAPCR 1200-03-07-.07(2)  
Compliance with this requirement shall be assured by operating the diesel generator as designed and complying with condition 3.
7. Carbon Monoxide (CO) emitted from this source shall not exceed 0.77 pounds per hour based on a daily average.  
TAPCR 1200-03-07-.07(2).  
Compliance with this requirement shall be assured by operating the diesel generator as designed and complying with condition 3.
8. Nitrogen oxides (NO<sub>x</sub>) emitted from this source shall not exceed 0.73 pounds per hour based on a daily average.  
TAPCR 1200-03-07-.07(2)  
Compliance with this requirement shall be assured by operating the diesel generator as designed and complying with condition 3.
9. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity, except for one (1) six-minute period per one (1) hour period and for no more than four (4) six-minute periods in any twenty-four (24) hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).  
TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)
10. Record keeping requirements for this source, including all data and calculations, must be updated and maintained based on the following schedule:

Record Keeping Type

Monthly Log

Update Requirement

Recorded within 30 days after the end of the month

TAPCR 1200-03-09

11. The permittee shall comply with all applicable federal and state regulations concerning the operation of this source. This includes but is not limited to, federal regulations published under 40 CFR part 63 for sources of hazardous air pollutants and 40 CFR part 60, New Source Performance Standards.  
  
This source shall operate in accordance with the terms of this permit and the information submitted in the approved permit application.  
TAPCR 1200-03-09-.03(8)
12. A new stationary RICE located at an area source must meet the requirements of 40 CFR part 63 subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines. No further requirements apply for such engines under 40 CFR part 63 subpart ZZZZ.  
40 CFR §63.6590(c)
13. Owners and operators of 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new non-road CI engines in 40 CFR §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE.  
40 CFR §60.4205 (b)
14. Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in the following paragraph:  
  
For engines with a maximum engine power greater than or equal to 37 KW (50 HP), the certification emission standards for new non-road CI engines for the same model year and maximum engine power in 40 CFR §89.112 and 40 CFR §89.113 for all pollutants beginning in model year 2007.  
40 CFR §60.4202(a)(2)
15. Beginning October 1, 2010, owners and operators of stationary CI ICE subject to 40 CFR part 60 subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR §80.510(b) for non-road diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted.  
40 CFR §60.4207(b)
16. If you are an owner or operator and must comply with the emission standards specified in 40 CFR part 60 subpart IIII, you must do all of the following, except as permitted in condition 18.  
  
Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions,  
  
Change only those emission-related settings that are permitted by the manufacture, and  
  
Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to you.  
40 CFR §60.4211(a)
17. If you own or operate an emergency stationary ICE, you must operate the emergency stationary ICE according to the requirements in paragraphs (1) through (3) of this condition. In order for the engine to be considered an emergency stationary ICE under 40 CFR part 60 subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (1) through (3) of this condition, is prohibited. If you do not operate the engine according to the requirements in paragraphs (1) through (3) of this condition, the engine will not be considered an emergency engine under 40 CFR part 60 subpart IIII and must meet all requirements for non-emergency engines.

- (1) There is no time limit on the use of emergency stationary ICE in emergency situations.
- (2) You may operate your emergency stationary ICE for any combination of the purposes specified in paragraphs (2)(i) through (iii) of this condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (3) of this condition counts as part of the 100 hours per calendar year allowed by this paragraph.
  - (2)(i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Technical Secretary for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.
  - (2)(ii) Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 CFR §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
  - (2)(iii) Emergency stationary ICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (3) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (2) of this condition. Except as provided in paragraph (3)(i) of this condition, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
  - (3)(i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
    - (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
    - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
    - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
    - (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
    - (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

40 CFR §60.4211(f)

- 18. If you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.

40 CFR §60.4211(g)

19. The Permittee shall keep a log of the number of operating hours for each calendar year at this source, in a form that readily provides the information required in the following table and shows compliance with **Conditions 17**. All data, including all required calculations, must be entered in the log no later than thirty (30) days from the end of the month for which the data is required. The Permittee shall retain this record for a period of not less than two (2) years and keep this record readily available for inspection by the Technical Secretary or their representative. TAPCR 1200-03-10-.02(2)(a).

CALENDER YEAR LOG: Source 13-0114-01

| Year:    |                                   |                               |           |                                   |                               |
|----------|-----------------------------------|-------------------------------|-----------|-----------------------------------|-------------------------------|
| Month    | Hours Operated<br>(non-emergency) | Hours Operated<br>(emergency) | Month     | Hours Operated<br>(non-emergency) | Hours Operated<br>(emergency) |
| January  |                                   |                               | July      |                                   |                               |
| February |                                   |                               | August    |                                   |                               |
| March    |                                   |                               | September |                                   |                               |
| April    |                                   |                               | October   |                                   |                               |
| May      |                                   |                               | November  |                                   |                               |
| June     |                                   |                               | December  |                                   |                               |

20. If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 of 40 CFR part 60 subpart IIII, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time.

40 CFR §60.4214(b)

21. This permit shall serve as a temporary operating permit from initial start-up to the receipt of a standard operating permit, provided the operating permit is applied for within thirty (30) days of initial start-up and the conditions of this permit and any applicable emission standards are met.

TAPCR 1200-03-09

22. The permittee shall certify the start-up date of the air contaminant source regulated by this permit by submitting

**A COPY OF ALL PAGES OF THIS PERMIT,**

with the information required in A) and B) of this condition completed, to the Technical Secretary's representatives listed below:

A) DATE OF START-UP: 12 / 04 / 2013  
month day year

B) Anticipated operating rate: 100 percent of maximum rated capacity

For the purpose of complying with this condition, "start-up" of the air contaminant source shall be the date of the setting in operation of the source for the production of product for sale or use as raw materials or steam, heat, or electrical production.

The undersigned represents that he/she has the full authority to represent and bind the permittee in environmental permitting affairs. The undersigned further represents that the above provided information is true to the best of his/her knowledge and belief.

|  |                              |  |
|--|------------------------------|--|
| Signature<br><i>Michele M. Blazek</i>              |                              | Date<br>12/12/2013                       |
| Signer's name (type or print)<br>Michele M. Blazek | Title<br>Assistant Secretary | Phone (with area code)<br>(925) 327-2532 |

**Note:** This certification is not an application for an operating permit. At a minimum, the appropriate application form(s) must be submitted requesting an operating permit. The application must be submitted in accordance with the requirements of this permit.

The completed certification(s) shall be delivered to the East Tennessee Permit Program and the Environmental Field Office at the addresses listed below, no later than thirty (30) days after the emission unit(s) are started-up.

**East Tennessee Permit Program &  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 15th Floor  
Nashville, TN 37243**

**Knoxville Environmental Field Office  
Division of Air Pollution Control  
3711 Middlebrook Pike  
Knoxville, TN 37921**

An electronic copy (PDF) can also be submitted to one of the following email addresses:

Air.Pollution.Control@tn.gov and APC.KnoxEFO@tn.gov

TAPCR 1200-03-09

(end of conditions)

The permit application gives the location of this source as 36°27'38' Latitude and -83°53'53" Longitude.